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Lee Memorial Health System

Community-owned - One of USA's Top 100 Hospitals

*Lee Memorial Hospital • HealthPark Medical Center
The Children's Hospital of Southwest Florida
Home Health Services • HealthPark Care Center*

March 1, 1996

Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

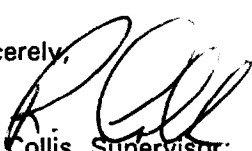
Sir:

Lee Memorial Health System wishes to express its support of the Critical Care Telemetry Group (CCTG) in the presentation of ET Docket No. 95-177 to establish clear radio channels for ECG telemetry monitoring.

We here at Lee Memorial, urge your utmost speed in addressing this vital patient safety issue. Our telemetry units have been experiencing first hand the results of the over crowded "secondary" channels. Since September of 1992, our hospital and Hewlett Packard have been involved in solving a problem of telemetry signal loss at our HealthPark facilities. Much expense and many manhours have been expended in attempting a solution to this problem to little or no avail. The expense aside, what is even more important is the patient safety issue. Critically impaired patients rely on the consistent transmission of their ECG to the hospital staff. The suitability of these frequencies to interference and subsequent signal loss create a situation where vital information many times may be lost. This is unacceptable!

The proliferation of more and newer communication devices coupled with the population growth here in southwest Florida presents us with an ever increasing problem. Action must be taken now to avert an even larger patient safety issue in the very near future. I thank you for this consideration and cooperation.

Sincerely,


Reg Collis, Supervisor
Clinical Engineering

c: Jim Cyrier, General Manager
Hewlett Packard Co.
3000 Minuteman Road
Andover, Massachusetts 01810

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Notice of Proposed Rulemaking
ET Docket # 95-177
Summary Sheet

- o The Critical Care Telemetry Group (CCTG), a group of biomedical telemetry device manufacturer's, submitted a petition to the Federal Communications Commission in December 1994.
- o Biomedical telemetry devices currently operate under provisions of the FCC Rules which permit transmission in portions of both the VHF and UHF television bands.
- o Today, there is no dedicated radio spectrum for medical telemetry. Telemetry must share channels with other users.
- o The power of medical telemetry transmitters is limited by FCC rules and by the size of batteries that a cardiac patient can carry.
- o The lower the radio-transmission power, the more susceptible it is to interference from other sources.
- o Interference may temporarily prevent monitors from receiving ECG and other vital information, which could cause an important cardiac event to be missed or require hospital staff to check on the patient each time the signal is lost.
- o Interference may emanate from unintended sources or from other transmissions permitted on the same or nearby frequencies as the telemetry unit. Units operating at lower power are more susceptible to interference.
- o Nearby frequencies for some telemetry units are used by police, ambulances, taxis, tow trucks and construction cranes, as well as for general business voice communications -- some at very high power. This congestion limits the number of useable channels, especially in major metropolitan areas.
- o If this NPRM is adopted, these actions should reduce the possibility of interference encountered by medical telemetry systems and increase the number of available and usable channels.
- o Comments must be filed on or before April 16, 1996.



SCOTT & WHITE



11 1996
February 29, 1996

Secretary Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: E T Docket No. 95-177

Dear Secretary,

I am writing you in support of the Critical Care Telemetry Group (CCTG) petition to increase the maximum allowable power of medical telemetry transmitters to five milliwatts and expand the spectrum allocation to vacant upper VHF and vacant UHF television channels. Scott & White Memorial Hospital utilizes medical telemetry extensively for ambulatory patient monitoring. Telemetry not only makes ambulatory patient monitoring possible, it does so without the additional cost of structural modifications, cabling and the labor cost associated with installation of hard wired monitoring systems. We feel that it is essential that needed regulatory adjustments be made to allow continued expansion of this technology to meet our patient needs, facilitate future innovation, and protect the quality of transmission.

Sincerely,

Doug McFarland
Biomedical Engineering Manager
Scott & White Memorial Hospital

xc: Michael J. Miller, JD
AAMI President

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WASHINGTON, D.C. 20554

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